

ANDERSON KILL P.C.

Attorneys and Counselors at Law

1251 AVENUE OF THE AMERICAS ■ NEW YORK, NY 10020
TELEPHONE: 212-278-1000 ■ FAX: 212-278-1733
www.andersonkill.com

Jerry S. Goldman, Esq.
Jgoldman@andersonkill.com
212-278-1569

Via ECF

July 27, 2022

The Honorable George B. Daniels
U.S. District Judge
United States District Court
Southern District of New York
Daniel P. Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

The Honorable Sarah Netburn
U.S. Magistrate Judge
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: In re Terrorist Attacks on September 11, 2001, No. 03-MDL-1570 (GBD) (SN); *BNY Mellon, et al. v. Islamic Republic of Iran*, No. 1:19-cv-11767 (GBD) (SN); *Marinella Hemenway, et al. v. Islamic Republic of Iran*, No. 1:18-cv-12277 (GBD) (SN); *Deborah Bodner, et al. v. Islamic Republic of Iran*, No. 1:19-cv-11776 (GBD) (SN); *August Bernaerts, et al. v. Islamic Republic of Iran*, No. 1:19-cv-11865 (GBD) (SN); *Ber Barry Aron, et al. v. Islamic Republic of Iran*, No. 1:20-cv-09376 (GBD) (SN); *Jeanmarie Hargrave, et al. v. Islamic Republic of Iran*, No. 1:20-cv-09387 (GBD) (SN); *Michael Bianco, et al. v. Islamic Republic of Iran*, No. 1:20-cv-10902 (GBD) (SN) – Functional Equivalent Reports & Recommendations

Dear Judge Daniels and Magistrate Judge Netburn:

I write today on behalf of functional equivalent plaintiffs in the above-captioned cases in response to the Court's Reports & Recommendations, dated July 26, 2022. *See* ECF Nos. 8264, 8267. In each Report & Recommendation, the Court encouraged the functional equivalent plaintiffs "to notify the Court as soon as possible if any objections will be filed." ECF No. 8264 at p. 14; ECF No. 8267 at p. 6. Plaintiffs write to inform the Court that they will not object to the Reports & Recommendations and respectfully request that the Court enter final judgments in favor of the functional equivalent plaintiffs discussed in the Reports & Recommendations.

I thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Jerry S. Goldman

Jerry S. Goldman, Esq.

Attorney for the Plaintiffs

New York, NY ■ Los Angeles, CA ■ Stamford, CT ■ Washington, DC ■ Newark, NJ ■ Philadelphia, PA

Anderson Kill P.C.

The Honorable George B. Daniels
The Honorable Sarah Netburn
July 27, 2022
Page 2

cc: All MDL Counsel of Record (via ECF)
Joan Ruth Puwalski (via email)
Laura Nogaj (via email)
Jude Monteserrato a/k/a Judith Monteserrato (via email)
Janice Dukes (via email)
Jesse Kemp (via email)
Brian Wilkes (via email)
Maureen Sullivan (via email)
Nicholas Kemp (via email)
Karen Carlucci (via email)
Lucy Aita (via email)
Cristal Barragan (via email)
Katherin Pleitez (via email)
Denyse Betcher (via email)
Danny J. Marino (via email)
Natalie Pollack (via email)
Jamielah Persol (via email)
Eric Johnson (via email)
Joseph Dixon (via email)